

August 11, 2010

Phil Giudice
Commissioner
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Subject: Comments on DOER Biomass RPS Rulemaking Process

Dear Commissioner Giudice,

My name is Edward Esko. I'm the founder of Berkshire Green Energy (BGE), a sustainable energy start up located in Pittsfield. BGE is working to develop micro-algae as a source of biofuel, both for our transportation and electric generation needs.

Our primary project, Farm Fuel, is dedicated to helping Massachusetts farmers gain energy independence. We are working with a local farmer to develop a prototype algae fuel facility. Our goal is to grow algae on the farm and set up a pilot facility to extract algae fuel to power farm equipment. Once the pilot facility is set up, our hope is to help farmers throughout the region adopt the technology so that they can lower fuel costs and move toward energy independence. We are in contact with the USDA Rural Development Office regarding a grant for this project that we hope to get underway this year.

I'm writing to ask your consideration of several points relevant to the new regulations contemplated by the July 7 letter from Ian Bowles to DOER. These regulations have a direct impact on small business startups such as Berkshire Green Energy. Our Farm Fuel algae project came about due to our partnership with another local start up firm, Berkshire Renewable Power, that is planning to develop a biofuel facility in Western Mass. Our plan is to grow algae as a source of fuel for the proposed biofuel plant and to use algae to recycle carbon dioxide produced by the plant.

Adoption of overly restrictive regulations would negatively impact the ability of the biofuel project to move forward. For example unrealistic operating efficiency standards (e.g. above 40%) would prevent the project from qualifying for renewable energy credits despite its very advantageous GHG lifecycle emissions profile. This would negatively impact the development of Farm Fuel and other Berkshire Green Energy initiatives. Similar projects throughout the Commonwealth would also be negatively impacted by such regulation.

I believe that the goal of reducing carbon emissions is an important one. At the same time, however, it is equally important that we not go overboard in implementing that goal, and that we rely on established science and long-term economic impact when crafting responsible guidelines.

Regulations aimed at addressing the problem of climate change should not hinder the development of green technology in the state. As a citizen of the Commonwealth, and founder of a green energy start up, I urge you to consider the adoption of broad and realistic guidelines in setting minimum operating efficiency standards for biomass plants. Adoption of a rigid numerical percentage that is applicable to all biomass plants will stifle technological innovation in the emerging green energy field that will reduce GHG emissions, eliminate the creation of new green energy jobs, or drive these jobs out-of-state, and fail to position Massachusetts at the forefront of the emerging green economy.

Small business and entrepreneurship are the backbone of the economy. They are hotbeds of technological innovation, and our best hope of remaining competitive in the global economy. The emerging green industry in the Commonwealth holds great promise in helping solve, rather than contributing to, the problem of climate change. In a state where more than 90 percent of the electricity is generated by non-renewable sources, with fossil fuels leading the way, adoption of overly restrictive regulations on the development of green energy is in essence an endorsement of the status quo, a status quo that is clearly unsustainable.

I therefore urge you to take a proactive role in supporting entrepreneurship, small business, and technological innovation in the Commonwealth by not setting minimum operating efficiency standards that stifle the development of promising green technologies.

Sincerely,

Edward Esko
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